

ATTACHMENT 11



United States of America
FEDERAL TRADE COMMISSION
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March 15, 2024

VIA ELECTRONIC MAIL

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RE: *FTC v. Amazon.com, Inc., et al.*, No. 2:23-cv-0932-JHC (W.D. Wash.)

Dear Counsel:

We write regarding the updated data sample Amazon produced on March 8, 2024 at Exhibit A ("Updated Data Sample"), as well as its responses to the FTC's questions in its February 15, 2024 letter and Document Requests 55, 56, 60, 67, 68, 69, 70, and 73. Based on our review of these materials, we need additional information to understand and evaluate the completeness of the Updated Data Sample. We provide our questions below and are available to discuss these items on a call if it would be more convenient.

Incomplete or Missing Data

For each of the below items, we have been unable to locate some or all of the data requested in the specified Document Requests. Please either confirm that Amazon does not have responsive data or explain Amazon's basis for withholding the responsive data.

1. Chargeback information (*see* Document Requests 55.h, 56.d, 60.j, 60.k).
2. Dates on which Prime members contacted customer service to request cancellation, the duration of these interactions, and any cancellation reasons provided (*see* Document Requests 55.p, 55.r, 55.u).
3. Dates on which Amazon customer service representatives directed Prime members to the online Prime Cancellation Process (*see* Document Request 56.h).
4. Manner of resolution of calls that did not result in cancellation (*see* Document Request 56.j).
5. Dates on which Prime members visited the Amazon "mShop" App or Kindle App after enrolling in Prime (*see* Document Requests 55.n, 60.p, 68.q).
6. Dates and times relating to Amazon.com visits during which Prime members cancelled their memberships (*see* Document Request 56.n).
7. Dates and "SICs" or "reason codes" associated with all customer service contacts (*see* Document Request 55.k).¹
8. Volume and percentage of customer service contacts relating to each "SIC" or "reason code" (*see* Document Request 73).
9. Data related to the surveys described in Appendix 4 to AMZN_00080322 (Document Requests 67, 68). **Please let us know as soon as possible whether Amazon intends to produce data from these surveys.**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

¹ We received your March 13 email attaching a spreadsheet containing all SICs. We are reviewing the spreadsheet to determine whether additional information is necessary.

[REDACTED]

[illegible]

[REDACTED]

[REDACTED]
 [REDACTED]
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[REDACTED]
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[REDACTED]
 [REDACTED]
 [REDACTED]

[illegible]

1. [REDACTED]
 [REDACTED]
 2. [REDACTED]
 [REDACTED]
 3. [REDACTED]
 [REDACTED]
 4. [REDACTED]
 [REDACTED]

[REDACTED]

Please note that our review is ongoing and we may have further questions, including based on Amazon's responses and any additional data it produces.

Sincerely,

/s/ Sana Chaudhry
Counsel to the Federal Trade Commission

⁶ [REDACTED]